

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC.

Plaintiffs,

V.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

DECLARATION OF E. LINDSAY
CALKINS IN SUPPORT OF
PLAINTIFFS' REPLY TO
DEFENDANT'S OPPOSITION TO
CROSS-MOTION TO LIMIT PRIOR
ART REFERENCES

I, Erin Lindsay Calkins, declare as follows:

1. I am a member in good standing of the Washington State Bar.

2. I am an associate at the law firm Susman Godfrey LLP, counsel for Plaintiffs

Eagle Harbor Holdings, LLC, and MediusTech, LLC (collectively “Medius”) in this action. I submit this declaration in support of the Plaintiffs’ Reply to Defendant’s Opposition to Cross-Motion to Limit Prior Art References, which is filed herewith.

3. Attached hereto as **Exhibit 1** is a true and correct copy of email correspondence between Floyd Short, counsel for Medius, Todd Zubler, counsel for Defendant Ford (“Ford”), and Michael Summersgill, counsel for Ford, including an October

1 2, 2013 email from F. Short to M. Summersgill and an October 15, 2013 email from T. Zubler
2 to F. Short.

3 4. Attached hereto as **Exhibit 2** is a true and correct copy of email
4 correspondence between Genevieve Vose Wallace, counsel for Medius, and Gregory Teran,
5 counsel for Ford, including an October 22, 2013 email from G. Teran to G. Wallace, an
6 October 25, 2013 email from G. Wallace to G. Teran, and an October 25, 2013 email from G.
7 Teran to G. Wallace.

8 I declare under penalty of perjury that the foregoing is true and correct.
9

10 Executed this 1st day of November, 2013.
11

12 By: /s/ E. Lindsay Calkins
13 E. Lindsay Calkins (WSBA No. 44127)
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who have registered for electronic notifications, and will cause the foregoing to be served upon the following by email:

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Dated: November 1, 2013

By: s/ Bianca Nealious